

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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HAITIAN EVANGELICAL CLERGY  
ASS'N, *et al.*,

Plaintiffs,

v.

**NOTICE OF MOTION**

**Oral Argument Requested**

DONALD J. TRUMP, President of the  
United States of America, *et al.*,

Civil Action No.  
1:25-cv-1464 (BMC)

Defendants.

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PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law and upon all pleadings and proceedings herein, Defendants President Donald J. Trump in his official capacity, Secretary of Homeland Security Kristi Noem in her official capacity, the Department of Homeland Security, and the United States of America will move before the Honorable Brian M. Cogan, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, on a date and a time to be designated by the Court, for dismissal of the Plaintiffs' Complaint against the Defendants in its entirety, with prejudice, pursuant to Fed. R. Civ. P. 12 or, in the alternative, denial of Plaintiffs' Motion for Partial Summary Judgment in its entirety, pursuant to Fed. R. Civ. P. 56; and for such other relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's current Scheduling Order (ECF No. 33), Plaintiffs' brief in support of their motion for postponement of the effective date of termination of Haiti's TPS under 5 U.S.C. § 705 must be served on April 15, 2025; Defendants' opposition to Plaintiffs' motion for postponement is due by April 29, 2025.

Additionally, Plaintiffs' brief (i) in opposition to Defendants' motion to dismiss and (ii) reply in support of their motion for partial summary judgment must be served by April 29, 2025. Finally, Defendants' reply in support of their motion to dismiss and Plaintiffs' reply in support of their motion for postponement must be served on or before May 6, 2025.

Dated: April 15, 2025

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